



Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

Applicant: Saskatchewan Organic Certification Association (SOCA)
Program : National Organic Program – On-site Audit
Location(s): SOCA Office, and Robert Spencer Farm – Tisdale, SK, Canada
Audit Date(s): August 24-25, 2004
Audit File Number: NP4237BBA
Action Required: Yes
Auditor(s): Martin Friesenhahn – Team Leader, Rick Skinner – Auditor
Contact & Title: Russell Plamondon – President/Administrator
E-mail Address: p.and.e@sasktel.net

AUDIT ACTIVITIES

On August 24-25, 2004, representatives of the USDA, AMS, LS, Audit, Review, and Compliance (ARC) Branch conducted an on-site audit of the Saskatchewan Organic Certification Association (SOCA) Organic Certification Program in Tisdale, SK, Canada. The purpose of the audit was to assess SOCA's compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). The audit also included observations and interviews of SOCA's certification and inspection activities at the Robert Spencer Farm in Tisdale, SK, Canada. This was an annual NOP organic inspection conducted by Inspector Wayne Schmalz. The farm consisted of 342 acres of certified barley, oats, flax and alfalfa.

SOCA is a non-profit member based organic certification agency that was accredited as a certifying agent by the USDA for crop, wild crop, livestock, and handling operations on September 17, 2002. SOCA currently has approximately 82 clients certified to the NOP with the majority as crop operations and some livestock and handling operations. The first NOP certifications by SOCA were completed in 2003. No wild crop operations have been certified by SOCA. SOCA organic program procedures, policies and records were reviewed during the audit with President/Administrator Russell Plamondon and Certification Chair Norm Bromm. The audit documentation is on record and available for review (**NP4237BBA Audit Documentation**).

FINDINGS

The audit confirmed that SOCA was operating under the guidelines of the NOP except as noted in the findings. Eight Minor non-compliances and two Continuous Improvement Points (CIP) were identified during the audit.

Non-compliances:

NP4237BBA.NC1 – Minor – Granting certification – certificates – 205.404(b)(2) – Requires certificates to include the effective date of certification and (c)...continues in effect until surrendered *SOCA certificates did not include the effective date of when the client was first certified to the NOP but included a "Valid date" that changes each year. In addition, the certificates included a "Crop year" that changes each year and would imply that the certificate has to be updated each year to be valid.*

NP4237BBA.NC2 – Minor – General requirements for accreditation – Performance evaluations – 205.501(a)(6) – Requires the certifying agent to conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents,

..... *Performance evaluations of reviewers, inspectors, decision makers, etc. were not completed.*

NP4237BBA.NC3 – Minor – General requirements for accreditation – Annual program review – 205.501(a)(7) – Requires the certifying agent to have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant..... *The annual internal audit listed in SOCA's procedures for the annual program review had not been completed. The documented program review presented during the audit by SOCA only listed information to the Board of Directors and not information required by the NOP.*

NP4237BBA.NC4 – Minor – General requirements for accreditation – 205.501 (a)(8) – Requires the certifying agent to provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act..... *The certifications prior to NOP accreditation were based on the SOCA Organic Standards (similar to the NOP Standards). The SOCA Certification Handbook and various certification forms had numerous references to the SOCA Organic Standards. Additional requirements outside of the NOP were listed in the SOCA Organic Standards of the SOCA Certification Handbook. Although the NOP Standards were included in the SOCA Certification Handbook, it was not clear if standards were provided for two different certification programs (SOCA and NOP) or only to the NOP. The information provided to the clients was therefore confusing and unclear as to the program certified to. It was noted during the audit that all clients certified by SOCA had been certified to the NOP.*

NP4237BBA.NC5 – Minor – General requirements for accreditation – confidentiality – 205.501(a)(10) – Requires certifying agents to maintain strict confidentiality with respects to it clients under the applicable organic certification program... *SOCA completes annual letters of agreement, certification agreements, or includes the confidentiality information on Annual Disclosure forms. The signed confidentiality information was missing or not updated for the majority of inspectors or not updated for some of the various committee and Board of Director Members.*

NP4237BBA.NC6 – Minor – Genral requirements for accreditation – conflict of interest – 205.501(a)(11)(ii) – Requires certifying agents to prevent conflict of interest by excluding any person, including contractors, with conflicts of interest from work, discussions, and decisions in all stages of the certification process.... *The Certification Chair Norm Bromm listed the Robert Spencer Farm as a conflict of interest in his Conflict of Interest Disclosure Report. Norm Bromm completed the Pre-Inspection Review (application review) on this farm when the review should have been completed by a different member of the Pre-inspection committee.*

NP4237BBA.NC7 – Minor – General requirements for accreditation – Conflict of interest reports – 205.501(a)(11)(v) – **The** certifying agent must have all persons who review applications for certifications, perform on-site inspections, review certification documents.....or make certification decisions.....to complete an annual conflict of interest disclosure report. *Annual conflict of interest disclosure reports were missing or not updated annually for some inspectors and not updated annually for some committee members.*

NP4237BBA.NC8 – Minor – Genral requirements for accreditation – 205.501(a)(18) – The certifying agent is required to notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor non-compliances. *SOCA did not provide this information to inspectors after the inspections.*

Continuous Improvement Points:

NP4237BBA.CIP1 – 205.501(a)(9) – Most of the SOCA 2004 original files were with the inspectors or the various committee members for review and/or inspection and not located at the SOCA Office. However, the majority of the files were retrieved and available for the audit. The remaining 2004 files located with the inspectors or committee members were not retrieved and therefore not reviewed during this audit. However, when missing 2004 files were requested, information was presented as to which inspector or committee member had the requested file.

NP4237BBA.CIP2 – The SOCA Certification Handbook provides information on the responsibilities of the various SOCA Committees used in the certification program. The Certification Handbook refers to the committees as reviewing applications, files, etc. when in actual practice only one member of the committee conducts the review. In addition, the Administrator does not sit on the Pre-Inspection Committee review as stated in the Certification Handbook.

RECOMMENDATIONS

Based on the audit findings the audit team recommends the continuation of Saskatchewan Organic Certification Association as an accredited certifying agent with the condition of addressing the non-compliances as directed by the National Organic Program.